

Independent claims 1, 11, and 22 were previously amended in an Amendment dated April 10, 2002 to more clearly define the invention. More specifically, the claims were amended to more clearly indicate that an automated set of operations generates information representative of at least a first state machine and a second state machine, the first state machine for controlling a first set of labels for soft-labeled keys of a first terminal associated with a first user, and the second state machine for controlling a second set of labels for soft-labeled keys of a second terminal associated with a second user. The claims have also been amended to more clearly indicate that the automated set of operations processes input indicative of terminal features desired by each of said first user and said second user in order to generate the respective first and second state machines. In this way, the first and second state machines produce different soft-labeled key displays for the respective first and second terminals.

The elements described above with regard to claims 1, 11 and 22 as amended are not disclosed by Suzuki. In the Response to Arguments section of the final Office Action, the Examiner argues that column 28, lines 35-39 of Suzuki discloses first and second state machines producing different soft-labeled keys for the respective first and second terminals. Applicants respectfully traverse.

There are at least two problems with the argument put forth by the Examiner. First, as stated above, independent claims 1, 11 and 22 claim more than simply producing different soft-labeled keys for different terminals. Claims 1, 11 and 22 define an automated set of operations that generate information representative of at least a first state machine and a second state machine for controlling a set of labels for soft-labeled keys of each of the respective terminals. Such a set of automated operations is not disclosed in Suzuki and is not discussed in the Office Action. In addition, there is no disclosure in Suzuki of the automated set of operations processing input indicative of terminal features desired by each of a first user and a second user in order to generate respective first and second state machines, thereby producing different soft-labeled key displays for the respective first and second terminals. This aspect of claims 1, 11 and 22 is also not discussed in the Office Action.

Second, column 28, lines 35-39 of Suzuki does not address first and second state machines producing different soft-labeled keys for the respective first and second terminals, as argued by the Examiner. Column 28, lines 32-39 of Suzuki states:

In addition, it is also possible to provide a plurality of displays in different languages for the same display content, such that a user can select a display in a desired language by means of a display format setting mode according to his need. In this manner, it becomes possible to provide the portable communication device which can be used by many people with different mother tongues.

Thus, this section of Suzuki merely discloses the ability to change display language through a display format of a particular communication device. There is no disclosure of an automated set of operations that generates information representative of at least a first state machine and a second state machine for controlling a set of labels for soft-labeled keys of each of the respective terminals, and that processes input indicative of terminal features desired by each of a first user and said second user in order to generate respective first and second state machines, thereby producing different soft-labeled key displays for the respective first and second terminals.

Since Suzuki fails to disclose all of the elements of independent claims 1, 11 and 22, and, therefore, all of the claims dependent thereon, Applicants respectfully request the withdrawal of the §102(e) rejection of claims 1-4, 6-8, 10-14, 16-18 and 20-22.

Claims 3 and 13 claim a method and apparatus, respectively, wherein the information generated by an automated set of operations includes "a control table specifying a set of label identifiers for each of at least a subset of the plurality of states of at least one of the first and second terminals, and a label table specifying, for each of at least a subset of the labels identified by a given one of the label identifiers, a character string corresponding to the label, a feature identifier associated with the label, and a presentation attribute." In the Response to Arguments portion on page 4 of the Office Action, the Examiner asserts that these various elements are disclosed in Suzuki in FIGS. 5-9 and column 28, lines 15-39. Applicants respectfully disagree.

FIGS. 5-9 of Suzuki show various operating modes or state structures. However, there is no disclosure of a control table specifying a set of label identifiers for each of at least a subset of the plurality of states of at least one of the first and second terminals, and a label table specifying, for each of at least a subset of the labels identified by a given one of the label identifiers, a character string corresponding to the label, a feature identifier associated with the label, and a presentation

attribute, as set forth in claims 3 and 13. In addition, as discussed above, the information set forth in FIGS. 5-9 of Suzuki is not generated by an automated set of operations defined in claims 1 and 11, as is the control table of claims 3 and 13, respectively.

Examples of such control tables are described in the specification at page 12, line 28 to page 14, line 24, and in FIGS. 7 and 8. As explained in the specification and shown in FIG. 7, the control table includes a state identifier STATE\_ID and a list of label identifiers (LIDs) which serve as pointers to the associated SLK labels for that state. Each of the LIDs in the control table of FIG. 7 points to a specific set of information in the label table of FIG. 8. This set of information in the label table may include, for a given LID, a character string corresponding to a given label, and a feature identifier, e.g., an SBID, corresponding to the internal system code for a given feature. The label table as stored in the terminal may also include a presentation attribute for the current presentation state, e.g., on, off, blink, etc. The label table provides a single point of update for multiple occurrences of a single SLK string.

Since a control table as defined in claims 3 and 13 is not disclosed in Suzuki, Applicants respectfully request the withdrawal of the §102(e) rejection of claims 3 and 13, and the claims dependent thereon.

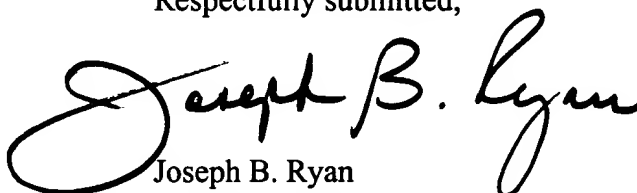
Claims 4 and 14 further define claims 3 and 13, respectively, wherein the set of operations includes an operation for checking a system database to extract a system identifier and a character string for the corresponding label. This element is not disclosed by Suzuki and is not discussed in the Office Action.

Claims 6 and 16 further define claims 4 and 14, respectively, wherein the set of operations includes an operation for determining a descendant relationship definition for the extracted feature identifier. This element is not disclosed by Suzuki and is not discussed in the Office Action.

Claims 7 and 17 further define claims 6 and 16, respectively, wherein the set of operations includes an operation for creating a state in a state machine based on the relationship definition for the extracted feature identifier. This element is not disclosed by Suzuki and is not discussed in the Office Action.

Accordingly, Suzuki fails to teach each and every element of the pending claims. Therefore, at least for the foregoing reasons, Applicants believe that claims 1-8, 10-18 and 20-22 are in condition for allowance, and respectfully request withdrawal of the §102(e) rejections. As indicated above, a Notice of Appeal is filed concurrently herewith.

Respectfully submitted,

A handwritten signature in black ink, reading "Joseph B. Ryan". The signature is fluid and cursive, with a large, looping initial "J".

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